

SURROGATE'S COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

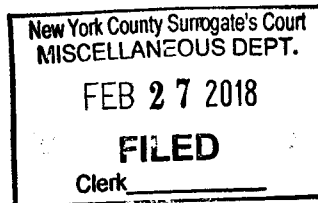
In the Matter of DALIA GINGER, trustee of the OLRV
GINGER 1993 TRUST,

Petitioner,

-against-

ORLY GINGER, ARIE GINGER, GLENCOVA INVESTMENT
COMPANY, TR INVESTORS, LLC, NEW TR EQUITY I, LLC,
NEW TR EQUITY II, LLC, TRANS-RESOURCES, INC., ARNOLD
BROSER, DAVID BROSER, JOHN DOES 1-20 AND JANE
DOES 1-20,

Respondents.



File No. 2008-0017E

Hon. Nora S. Anderson

Supplemental
Affirmation of
Judith Bachman in
Opposition

Judith Bachman, an attorney duly admitted to practice before the Court of the State of
New York, affirms under penalties of perjury:

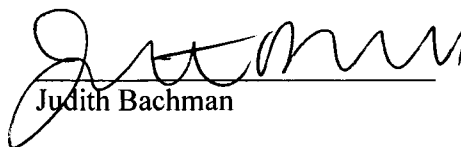
1. I am the attorney for Petitioner, Dalia Genger, and I make this affirmation to supplement the opposition to the motions to dismiss the Turnover Proceeding of Petitioner and in support of the Petitioner's cross-motion.
2. I make this affirmation to 'clarify' that the Cross-Motion Petitioner made and the opposition to the motions to dismiss are directed to all Respondents in this matter, including but not limited to, Orly Genger, Arie Genger, Glencova Investment Company, TR Investors, LLC, New TR Equity I, LLC, New TR Equity II, LLC, Trans-Resources, Inc., Arnold Broser, David Broser.
3. This 'clarification' was requested by counsel for Arnold and David Broser (collectively "Broser"). However, it is not required since, as stated in the preliminary statement in Petitioner's Memorandum of Law: Petitioner Dalia Genger ("Dalia" or "Petitioner"),

trustee of the Orly Genger 1993 Trust (“Orly Trust”), opposes the respondents’ respective motions to dismiss Dalia’s turnover proceeding (“Turnover Proceeding”) because Dalia must be allowed to protect the Orly Trust and the proceeding is timely, the citation was properly served, and the claims are well pled.

4. I note that only Orly Genger and TR (meaning, Glencova Investment Company, TR Investors, LLC, New TR Equity I, LLC, New TR Equity II, LLC, Trans-Resources, Inc,) have filed substantive motions to dismiss the Turnover Proceeding.
5. Arie Genger and the Brosers did not file any meaningful opposition to the Petition but instead filed only “me too” affirmations relying on and referring to the papers filed by Orly Genger and TR.
6. Accordingly, for all of the reasons that Orly Genger’s and TR’s motions should fail, as laid out in the Petitioner’s opposition papers, likewise mean that Arie Genger’s and the Brosers’ ‘motions’ also fail.

WHEREFORE, I respectfully request that all of the Respondent’s motions to dismiss be denied and the cross-motion be granted and that the Petitioner have such other and further relief as is just and warranted.

Dated: February 26, 2018
New City, New York


Judith Bachman

Affirmation of Service by Mail

Judith Bachman, an attorney dully admitted to practice before the Courts of the State of New York, affirms under the penalties of perjury that: on _____2/26/18_____ the undersigned served the within Supplemental Affirmation on

John Boyle
Skadden, Arps
4 Times Square
New York, New York

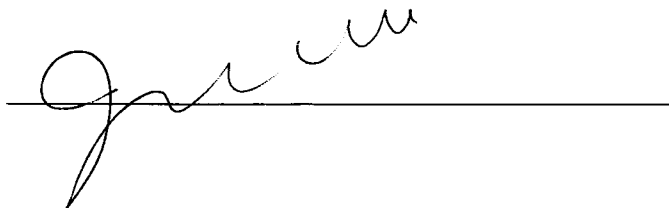
Michael P. Bowen
Kasowitz, Benson
1633 Broadway
New York, New York

Mitchell D. Goldberg
The Freyberg Law Group
950 Third Avenue
32nd Floor
New York, New York

Leon Friedman
685 Third Avenue
25th Floor
New York, New York

by depositing a true copying of same, enclosed in an postpaid, properly addressed wrapper, in an official depository of the United States Postal Service in New York State.

Dated: February 26, 2018
New City, New York

A handwritten signature in black ink, appearing to read 'Judith Bachman', is written over a horizontal line.